

MARQUIS AURBACH
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

Marquis Aurbach
Christian T. Balducci, Esq.
Nevada Bar No. 12688
W. Reese Levins, Esq.
Nevada Bar No. 15951
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
cbalducci@maclaw.com
rlevins@maclaw.com
*Attorneys for Kenai Drilling Limited and
Kenai Drilling Limited Employee Benefit Plan*

DISTRICT COURT

CLARK COUNTY, NEVADA

KENAI DRILLING LIMITED, a Delaware
Corporation, and KENAI DRILLING LIMITED
EMPLOYEE BENEFIT PLAN,,

Plaintiff,

vs.

SUN LIFE ASSURANCE COMPANY OF
CANADA,

Defendant.

Case Number:
2:24-cv-01559-CDS-EJY

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFFS
KENAI DRILLING LIMITED AND
KENAI DRILLING LIMITED
EMPLOYEE BENEFIT PLAN TO FILE A
REPLY IN SUPPORT OF PETITION TO
COMPEL ARBITRATION
(SECOND REQUEST)**

Pursuant to Local Rules IA 6-1 and IA 6-2, Plaintiffs Kenai Drilling Limited and Kenai Drilling Limited Employee Benefit Plan (“Plaintiffs”) and Defendant Sun Life Assurance Company of Canada (“Defendant”) (collectively “the Parties”) by and through their respective counsel of records, hereby stipulate and agree Plaintiffs shall have up to and including **October 11, 2024** to file a Reply in Support of Plaintiff’s Petition to Compel Arbitration. The present deadline for Plaintiffs to file their Reply is October 7, 2024, and no hearing has been set regarding Plaintiffs’ Petition to Compel Arbitration. This is the Parties’ second stipulation for extension of time for Plaintiffs to file their Reply in Support of the Petition to Compel Arbitration.

In support of this Stipulation, the Parties state as follows:

1. Plaintiffs filed their Petition to Compel Arbitration in the Eighth Judicial District Court in and for Clark County, Nevada on July 24, 2024.

MARQUIS AURBACH
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

2. Defendants filed a Petition for Removal of Action on August 23, 2024 [ECF No. 1].

3. Defendants filed their Response to Petition to Compel Arbitration on September 16, 2024 [ECF No. 13].

4. The Parties filed a Stipulation and Order to Extend Time on September 30, 2024 [ECF No. 23] giving Plaintiffs until October 7, 2024 to file their Reply in Support of their Petition to Compel Arbitration.

5. However, due to counsel for Plaintiffs' competing deadlines in other matters, Plaintiffs' counsel requires additional time to prepare and file its Reply in Support of the Petition to Compel Arbitration.

6. On October 7, 2024, counsel for Defendant consented to the relief requested.

7. This Stipulation is filed before the Reply in Support of the Petition to Compel Arbitration is due and is filed in good faith and not for purpose of unwarranted delay.

Dated this 7th day of October, 2024.

Dated this 7th day of October, 2024.

By /s/ W. Reese Levins
Christian T. Balducci, Esq.
Nevada Bar No. 12688
W. Reese Levins, Esq.
Nevada Bar No. 15951
MARQUIS AURBACH
10001 Park Run Drive
Las Vegas, NV 89145
Attorney(s) for Plaintiff

By /s/ Lance V. Clack
Bill E. Davidoff, Esq. (*Pro Hac Vice*)
Lance V. Clack, Esq. (*Pro Hac Vice*)
FIGARI + DAVENPORT, LLP
901 Main St. Ste 3400
Dallas, TX 75202

Ryan T. Gormley, Esq.
Nevada Bar No. 13494
WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC
6385 S. Rainbow Blvd., Ste. 400
Las Vegas, Nevada 89118

Attorneys for Defendant

IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

Date: October 7, 2024